

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Lisa Nguyen

Debtor

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Case No: 17-16142

Chapter 13

**OBJECTION OF MOTION FOR RELIEF
FROM THE AUTOMATIC STAY FILED BY MARK KNOUSE,
LYNN BRINKER AND KIM BEIDLER**

Lisa Nguyen, debtor in the above-captioned case (the “Debtor”), through her undersigned counsel, Gerald R. Clarke, Esquire, hereby objects to Motion for Relief from the Automatic Stay filed by Creditors captioned above for the following reasons:

1. The Debtors have or will file an amended Chapter 13 Plan that fully addresses pre-petition arrears;
2. Though the Debtor has incurred post-petition arrears of approximately \$4600 and the Debtor has proposed to pay \$4000 immediately with a bank check with the balance over a reasonable period of less than a year but has, to date, not received a response;
3. Debtor has proposed to commence scheduled mortgage payments in full beginning in January the tenth of each month;
4. Debtor proposes to ensure that Creditors post-petition arrears are materially satisfied therefore protection payments are not necessary;
5. Debtor has agreed to enter in to a stipulation agreement including all of the above;
6. The relief requested by the Creditors is not necessary.

WHEREFORE, the Debtor respectfully requests that the Court enter an order in the form annexed hereto, denying the Motion of the Creditor.

Dated: December 27, 2017

/s/ Gerald R. Clarke

Gerald R. Clarke

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In re: Lisa Nguyen

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**ORDER DENYING MOTION OF MARK KNOUSE,
LYNN BRINKER AND KIM BEIDLER FOR RELIEF
FROM THE AUTOMATIC STAY**

AND NOW, this _____ day of _____, 2017, upon consideration of the Motion for Relief from Automatic Stay filed by Mark Knouse, Lynn Brinker and Kim Beidler, said motion is denied.

BY THE COURT

Date: _____

Hon.
Bankruptcy Judge

Cc: Debtor
Counsel for Debtors
Office of the U.S. Trustee
Standing Chapter 13 Trustee
Creditors